1 2 3 4 5 6 7 8 9 10 11 12 13	ROSEMARIE T. RING (SBN 220769) rose.ring@mto.com MARI OVERBECK (SBN 261707) mari.overbeck@mto.com MUNGER, TOLLES & OLSON LLP 560 Mission Street Twenty-Seventh Floor San Francisco, California 94105-2907 Telephone: (415) 512-4000 Facsimile: (415) 512-4077 CHRISTINE P. SUN (SBN 218701) csun@aclunc.org ELIZABETH O. GILL (SBN 218311) egill@aclunc.org AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF NORTHERN CALIFORNIA, INC. 39 Drumm Street San Francisco, CA 94111 Telephone: (415) 621-2493 Facsimile: (415) 255-8437 Attorneys for Plaintiffs	CHAD A. READLER Acting Assistant Attorney General ANTHONY J. COPPOLINO Deputy Branch Director ANDREW E. CARMICHAEL Andrew.e.carmichael@usdoj.gov Virginia Bar No. 76578 Trial Attorney Civil Division, Federal Programs Branch U.S. Department of Justice 20 Massachusetts Avenue, N.W., Rm. 7218 Washington, D.C. 20044 Telephone: (202) 514-3346 Facsimile: (202) 305-2685 Attorneys for Defendant JAMES N. MATTIS	
14	UNITED STATES	DISTRICT COURT	
15	NORTHERN DISTRICT OF CALIFORNIA		
16	SAN FRANCISCO DIVISION		
- 1			
17			
17 18	MARY JENNINGS HEGAR, JENNIFER	Case No. 12-CV-06005 EMC	
18 19	MARY JENNINGS HEGAR, JENNIFER HUNT, ALEXANDRA ZOE BEDELL, COLLEEN FARRELL, AND SERVICE WOMEN'S ACTION NETWORK,	STIPULATED REQUEST AND [PROPOSED] ORDER FOR	
18 19 20	HUNT, ALEXANDRA ZOE BEDELL, COLLEEN FARRELL, AND SERVICE	STIPULATED REQUEST AND	
18 19 20 21	HUNT, ALEXANDRA ZOE BEDELL, COLLEEN FARRELL, AND SERVICE WOMEN'S ACTION NETWORK,	STIPULATED REQUEST AND [PROPOSED] ORDER FOR CONTINUANCE OF FURTHER CMC and	
18 19 20 21 22	HUNT, ALEXANDRA ZOE BEDELL, COLLEEN FARRELL, AND SERVICE WOMEN'S ACTION NETWORK, Plaintiffs,	STIPULATED REQUEST AND [PROPOSED] ORDER FOR CONTINUANCE OF FURTHER CMC and UPDATED CMC STATEMENT Judge: Hon. Edward M. Chen	
18 19 20 21 22 23	HUNT, ALEXANDRA ZOE BEDELL, COLLEEN FARRELL, AND SERVICE WOMEN'S ACTION NETWORK, Plaintiffs, vs.	STIPULATED REQUEST AND [PROPOSED] ORDER FOR CONTINUANCE OF FURTHER CMC and UPDATED CMC STATEMENT	
18 19 20 21 22 23 24	HUNT, ALEXANDRA ZOE BEDELL, COLLEEN FARRELL, AND SERVICE WOMEN'S ACTION NETWORK, Plaintiffs, vs. JAMES N. MATTIS ¹ , Secretary of Defense,	STIPULATED REQUEST AND [PROPOSED] ORDER FOR CONTINUANCE OF FURTHER CMC and UPDATED CMC STATEMENT Judge: Hon. Edward M. Chen Case Management Conference: Jul. 13, 2017	
18 19 20 21 22 23 24 25	HUNT, ALEXANDRA ZOE BEDELL, COLLEEN FARRELL, AND SERVICE WOMEN'S ACTION NETWORK, Plaintiffs, vs. JAMES N. MATTIS ¹ , Secretary of Defense,	STIPULATED REQUEST AND [PROPOSED] ORDER FOR CONTINUANCE OF FURTHER CMC and UPDATED CMC STATEMENT Judge: Hon. Edward M. Chen Case Management Conference: Jul. 13, 2017	
18 19 20 21 22 23 24 25 26	HUNT, ALEXANDRA ZOE BEDELL, COLLEEN FARRELL, AND SERVICE WOMEN'S ACTION NETWORK, Plaintiffs, vs. JAMES N. MATTIS ¹ , Secretary of Defense, Defendant.	STIPULATED REQUEST AND [PROPOSED] ORDER FOR CONTINUANCE OF FURTHER CMC and UPDATED CMC STATEMENT Judge: Hon. Edward M. Chen Case Management Conference: Jul. 13, 2017 Time: 10:30 a.m.	
18 19 20 21 22 23 24 25	HUNT, ALEXANDRA ZOE BEDELL, COLLEEN FARRELL, AND SERVICE WOMEN'S ACTION NETWORK, Plaintiffs, vs. JAMES N. MATTIS ¹ , Secretary of Defense,	STIPULATED REQUEST AND [PROPOSED] ORDER FOR CONTINUANCE OF FURTHER CMC and UPDATED CMC STATEMENT Judge: Hon. Edward M. Chen Case Management Conference: Jul. 13, 2017 Time: 10:30 a.m.	

CASE NO. C-12-6005 EMC STIPULATED REQUEST AND [PROPOSED] ORDER 3

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STIPULATION

Plaintiffs Mary Jennings Hegar, Jennifer Hunt, Alexandra Zoe Bedell, Colleen Farrell and Service Women's Action Network and Defendant James N. Mattis, Secretary of Defense ("Secretary") (collectively, "the parties"), by and through their respective counsel, submit this Stipulated Request and Proposed Order for a continuance of the Case Management Conference (CMC) scheduled for July 13, 2017, and deadline for the parties' updated joint CMC Statement, which is currently due July 6, 2017. Defendant respectfully requests a continuance of the CMC to September 21, 2017, and the deadline for the parties' updated joint CMC Statement to September 14, 2017, and the Plaintiffs stipulate to such request. Defendant submits that the facts and circumstances set forth in the attached Declaration of counsel for Defendant establish good cause for the requested continuance as follows:

- 1. On January 12, 2017, the Court scheduled the further CMC in this matter for July 13, 2017, and ordered the parties to provide an updated joint CMC Statement by July 6, 2017. ECF No. 91.
- 2. Subsequently, Defendant's prior counsel, Ms. Caroline Wolverton left the Department of Justice and Defendant's current counsel, Mr. Andrew Carmichael, was assigned this case on June 8, 2017.
- 3. Mr. Carmichael has previously scheduled leave plans from July 7, 2017 through July 14, 2017.
 - 4. The current date of the CMC falls during Mr. Carmichael's previously scheduled leave.
- 5. Additionally, Mr. Carmichael has substantial briefs due in two other cases in late June and mid-July and as newly appointed counsel needs time to familiarize himself with the present litigation.
- 6. Plaintiffs' counsel would have a conflict with the CMC being rescheduled during the month of August due to her getting married and traveling on her honeymoon.
- 7. In light of the foregoing, Defendant respectfully requests that the Court continue the Case Management Conference to September 21, 2017, and the deadline for the parties' updated joint CMC Statement to September 14, 2017.

1	DATED: June 30, 2017	CHAD A. READLER Acting Assistant Attorney General
2		ANTHONY J. COPPOLÍNO Deputy Branch Director
3		
4		/s/ Andrew E. Carmichael
5		ANDREW E. CARMICHAEL
6		U.S. Department of Justice Attorneys for Defendant JAMES N. MATTIS
7		
8	DATED: June 30, 2017	MUNGER, TOLLES & OLSON LLP
9		Drug (/ p g g g g
10		By: /s/ Rosemarie T. Ring ROSEMARIE T. RING
11		Attorneys for Plaintiffs
12		MARY JENNINGS HEGAR, JENNIFER HUNT, ALEXANDRA ZOE BEDELL, COLLEEN FARRELL,
13		AND SERVICE WOMEN'S ACTION NETWORK
14		
15	Additional Counsel:	
16	STEVEN M. PERRY (SBN 106154)	LENORA M. LAPIDUS [pro hac vice]
17	MUNGER, TOLLES & OLSON LLP 355 South Grand Avenue, 35th Floor	AMERICAN CIVIL LIBERTIES UNION FOUNDATION
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19	Facsimile: (213) 687-3702 Email: steven.perry@mto.com	New York, NY 10004 Telephone: (212) 549-2668
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21		CHRISTINE P. SUN (SBN 218701)
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ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Andrew E. Carmichael, am the ECF User whose identification and password are being
used to file this Stipulated Request and [Proposed] Order for Continuance of Further Case
Management Conference and updated Case Management Statement. In compliance with General
Order 45.X.B, I hereby attest that all signatories have concurred in this filing.

[PROPOSED] ORDER

Pursuant to stipulation, it is SO ORDERED.

/s/ Andrew E. Carmichael

Dated: _____

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IT IS SO ORDERED

Judge Edward M. Chen